

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

2017 SEP 20 PM 1:18
CLERK OF COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA, : CASE NO. **1:17CR 108**
:
: INDICTMENT **DLOTT**
:
V. : 18 U.S.C. § 875(c)
: 18 U.S.C. § 2261A(2)(B)
:
MICHAEL CHAN : NOTICE OF FORFEITURE

The Grand Jury charges that:

COUNT 1
(Cyberstalking)

From about October 1, 2013, the exact date being unknown, until about August 2017, in the Southern District of Ohio, the Eastern District of New York, and elsewhere, Defendant, **MICHAEL CHAN**, with the intent to injure, harass, and cause substantial emotional distress to a person in another state, namely, Ohio, used facilities of interstate or foreign commerce, including electronic mail and internet websites, to engage in a course of conduct that caused substantial emotional distress to the victim and placed her in reasonable fear of death or serious bodily injury.

In violation of Title 18, United States Code, Section 2261A(2)(B).

COUNT 2
(Interstate Communications with Intent to Extort)

From about October 1, 2013, the exact date being unknown, until about August 2017, in the Southern District of Ohio and elsewhere, the defendant, **MICHAEL CHAN**, knowingly and willfully did transmit in interstate and foreign commerce from the State of New York to the State of Ohio, a communication via the internet to KM, and the communication contained a threat to

kidnap and injure KM, specifically, the defendant threatened to attack and rape KM, among other acts.

In violation of Title 18, United States Code, Section 875(c).

FORFEITURE ALLEGATION

Upon conviction of the offense set forth in Count 2 of this Indictment, defendant **MICHAEL CHAN**, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant, up to the value of the property described above.

A TRUE BILL



GRAND JURY FOREPERSON

**BENJAMIN C. GLASSMAN
UNITED STATES ATTORNEY**



**CHRISTY L. MUNCY
ASSISTANT UNITED STATES ATTORNEY**